

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**TRUMP FOR PRESIDENT, INC., *et al.*,  
Plaintiffs**

**v.**

**KATHY BOOCKVAR, in her capacity  
as Secretary of the Commonwealth of  
Pennsylvania, *et al.*,  
Defendants**

**No. 2:20-CV-0966-NR**

***Complaint Filed 6/29/20***

**Electronically Filed**

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**MOTION OF DEFENDANT, KATHY BOOCKVAR,  
FOR ADOPTION AND APPROVAL OF A PROTECTIVE ORDER**

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Defendant, Kathy Boockvar, through her undersigned counsel hereby moves this Honorable Court to adopt and approve a protective order for this matter, and in support thereof, avers as follows:

1. Plaintiffs commenced this action on June 29, 2020. *Doc. 1.*
2. On July 24, 2020, Plaintiffs served interrogatories and requests for production of documents on Defendant Boockvar.
3. Pursuant to an extension of time granted by the Court, Defendant Boockvar's responses are due by noon on August 10, 2020. *Doc. 335.*
4. In preparing Defendant Boockvar's discovery responses, counsel have identified documents that are confidential or proprietary in nature and must be protected from public disclosure.

5. Accordingly, Defendant Boockvar requests that this Court adopt and approve the protective order attached hereto as Exhibit A for purposes of this litigation.

6. Counsel for Defendant Boockvar has discussed this motion and agreement with Plaintiffs' counsel and they concur in this request.

Respectfully submitted,

PENNSYLVANIA OFFICE OF  
ATTORNEY GENERAL

By: /s/ Karen M. Romano

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*Counsel for Kathy Boockvar  
Secretary of the Commonwealth of  
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### **CERTIFICATE OF SERVICE**

I, Karen M. Romano, Chief Deputy Attorney General, do hereby certify that I caused the foregoing **Motion to Adopt and Approve a Protective Order**, to be filed with the United States District Court for the Western District of Pennsylvania via the Court's CM/ECF system, which will provide electronic notice to all counsel and parties of record.

*/s/ Karen M. Romano*

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KAREN M. ROMANO  
Chief Deputy Attorney General

DATE: August 10, 2020